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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-3 JUSTON LABARON YOUNG and
D-4 TIMOTHY IVORY CARPENTER,
a/k/a "Little Tim,"

Defendants.

CRIMINAL NO. 12-20218

HON. LAWRENCE P. ZATKOFF

VIOLATION: 18 U.S.C. § 1951
18 U.S.C. § 924(c)

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

**COUNT ONE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER

On or about December 13, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as "Little Tim," defendant herein, knowingly and unlawfully took, and aided and abetted Michael Anthony Green, Earnest Roy Holt and others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant's robbery of Radio Shack located at 13330 E. Jefferson Avenue in Detroit, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER

On or about December 13, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” defendant herein, knowingly used and carried, and aided and abetted Michael Anthony Green, Earnest Roy Holt, and others in using and carrying, a firearm during and in relation to the robbery charged in Count One of this Indictment, during which the firearms were brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER

On or about December 18, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” defendant herein, knowingly and unlawfully took, and aided and abetted Michael Anthony Green, Earnest Roy Holt and others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant’s robbery of T-Mobile located at 14304 Gratiot in Detroit, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT FOUR: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER

On or about December 18, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” defendant herein, knowingly used and carried, and aided and abetted Michael Anthony Green, Earnest Roy Holt, and others in using and carrying, a firearm during and in relation to the robbery charged in Count Three of this Indictment, during which the firearms were brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT FIVE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-3 JUSTON LABARON YOUNG

On or about January 7, 2011, within the Eastern District of Michigan, Southern Division, JUSTON LABARON YOUNG, defendant herein, knowingly and unlawfully took, and aided and abetted Michael Anthony Green, Earnest Roy Holt, and others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant’s robbery of T-Mobile located at 5843 W. Vernor in Detroit, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT SIX: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-3 JUSTON LABARON YOUNG

On or about January 7, 2011, within the Eastern District of Michigan, Southern Division, JUSTON LABARON YOUNG, defendant herein, knowingly used and carried, and aided and abetted Michael Anthony Green, Earnest Roy Holt, and others in using and carrying, a firearm during and in relation to the robbery charged in Count Five of this Indictment, during which the firearms were brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT SEVEN: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-3 JUSTON LABARON YOUNG

On or about February 2, 2011, within the Eastern District of Michigan, Southern Division, JUSTON LABARON YOUNG, defendant herein, knowingly and unlawfully took, and aided and abetted Michael Anthony Green, Earnest Roy Holt, and others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant's robbery of T-Mobile located at 12555 Grand River Avenue in Detroit, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT EIGHT: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-3 JUSTON LABARON YOUNG

On or about February 2, 2011, within the Eastern District of Michigan, Southern Division, JUSTON LABARON YOUNG, defendant herein, knowingly used and carried, and aided and abetted Michael Anthony Green, Earnest Roy Holt, and others in using and carrying, a firearm during and in relation to the robbery charged in Count Seven of this Indictment, during which the firearms were brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL.

/s Grand Jury Foreperson

Dated: 8/29/12

BARBARA L. MCQUADE
United States Attorney

s/ John N. O'Brien II (P39912)
Chief, Violent Organized Crime Unit

s/ Kenneth R. Chadwell (P39121)
Assistant United States Attorney

United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**
12-20218

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: KC KRC

Case Title: USA v. JUSTON LABARON YOUNG ET. AL.,**County where offense occurred :** WAYNE**Check One:**☒ **Felony**☐ **Misdemeanor**☐ **Petty**

☒ Indictment/___ Information --- **no prior complaint.**

___ Indictment/___ Information --- based upon prior complaint [Case number:]

___ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** 12-20218**Judge:** LAWRENCE P. ZATKOFF

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

D-4 TIMOTHY IVORY CARPENTER

18 U.S.C. §1951

18 U.S.C. §924(c)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.August 29, 2012

Date


KENNETH R. CHADWELL

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.